

# NERC Reliability Standard Audit Worksheet (RSAW) Review and Revision Process

Effective: March 1, 2018

## Background

A Reliability Standard Audit Worksheet (RSAW) is a guide provided by the Electric Reliability Organization (ERO) that describes types of evidence registered entities may use to demonstrate compliance with a Reliability Standard. RSAWs also include information regarding how the ERO may assess that evidence. RSAWs do not require specific evidence to be provided, and they are not intended to require a single, exclusive approach to assessing compliance with a Reliability Standard.

RSAWs are currently being drafted during the development of their corresponding Reliability Standards, which allows for enhanced transparency around the compliance expectations for Reliability Standards. RSAWs may not be used to change the scope or intent of a Reliability Standard.

Since it may be necessary to revise RSAWs, the following process will be used to review any proposed revision to an existing RSAW for an effective Reliability Standard. This process does not apply to RSAW edits that merely address formatting or errata edits to the Reliability Standard.

## RSAW Revision Process

1. NERC will post any revision to an RSAW subject to this Process along with any associated implementation dates for industry comment. These revisions will be posted for a period of at least 15 business days. Industry comments should focus on whether
  - a. the proposed revision to the RSAW
    - i. seeks to effectuate a change in the scope or intent of the corresponding Reliability Standard,
    - ii. introduces a technical error or inaccuracy, or
    - iii. seeks to retroactively change (from the existing RSAW) how registered entities provide evidence of their compliance with the requirements of the corresponding Reliability Standard; or
  - b. the effective date of the RSAW revision should be delayed to allow registered entities additional time to evidence their compliance with the requirements of the corresponding Reliability Standard.
2. NERC, along with the Regional Entities, will review the comments and may propose additional revisions to the RSAW to address industry comments. If additional revisions are proposed by

NERC, NERC will re-post the RSAW for industry comment for an additional 15 business days (see Item 1 of the Process).

3. In the event there are any unresolved comments after the posting contemplated by Item 2 of the Process, NERC staff will forward them, along with their rationale regarding their position with respect to any such comment, to the chair of the Board of Trustees Compliance Committee (BOTCC) for review. The comments will also be posted to the NERC website. The review will cover the following:
  - a. Does the proposed RSAW revision seek to effectuate a change in the scope or intent of the corresponding Reliability Standard?
  - b. Does the proposed RSAW revision introduce a technical error or inaccuracy?
  - c. Does the proposed RSAW revision seek to retroactively change (from the existing RSAW) how registered entities provide evidence of their compliance with the requirements of the corresponding Reliability Standard?
  - d. Should the proposed RSAW revision be delayed to allow registered entities additional time to evidence their compliance with the requirements of the corresponding Reliability Standard?
4. The chair of the BOTCC will take one of the following actions:<sup>1</sup>
  - a. Determine that no further action is required. The RSAW will thereafter go into effect on its proposed effective date.
  - b. Forward the proposed RSAW revisions for additional review by the full BOTCC. In that event, the proposed revisions to the RSAW would not go into effect until the BOTCC determined that each of the unresolved comments had been addressed.
5. In the event of a BOTCC determination pursuant to Item 4 of the Process above, NERC will post a summary of the BOTCC’s determination and, if necessary, thereafter revise the RSAW consistent with any determinations by the BOTCC.

Revision History		
Version	Date	Comments
1.0	06-27-2014	Original posting
1.1	03-01-2018	<ul style="list-style-type: none"> <li>• All references to Standards Oversight and Technology Committee (SOTC) of the NERC Board of Trustees have been replaced with references to the Board of Trustees Compliance Committee (BOTCC).</li> <li>• Formatting updated to conform with current NERC Style Guide.</li> </ul>

<sup>1</sup> Within 120 days of receipt of the unresolved comments from NERC staff, the BOTCC chair will notify industry of the review status.